

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Case No. 21-11158-MDC
	:	
Julia J. Chung	:	Document No.
	:	
Debtor,	:	
	:	
Hope USA, LLC	:	Related to Docket No. 14
	:	
	:	
Movant,	:	
v.	:	
	:	
Julia J. Chung,	:	
	:	
Respondent.	:	

**OBJECTION TO DEBTOR'S CHAPTER 13 PLAN DATED JUNE 11, 2021**

Hope USA, LLC ("Movant"), by and through its undersigned counsel, files this Objection to Debtor's Chapter 13 Plan dated June 11, 2021 and in support thereof, avers as follows:

1. On or about April 27, 2021, Julia J. Chung ("Debtor") filed a Chapter 13 bankruptcy case in the above-captioned matter.
2. The Debtor is the owner of real estate know as 1108 W. Autumn Court, Norristown PA 19426, Montgomery County (the "Property").
3. On or about July 6, 2021, Movant filed a secured proof of claim at Claims Register No. 4-1 with respect to delinquent payments due to Movant under a note that is secured by a mortgage lien against the Property. This claim showed an outstanding payoff of \$221,249.31.
4. On or about June 11, 2021, the Debtor filed a Chapter 13 Plan dated June 11, 2021 (the "Plan").
5. Part 4, Section 4(a) of the Plan, titled "Secured claims not provided for by the Plan" has a checked the box next to the bolded option stating "None."

6. The Plan makes no mention of the Movant's secured claim against the Property, and the Movant should have been listed as a secured creditor in Section 4(a) of the Plan.

7. Further, the Debtor's Plan lists Movant in Section 4(b) of the Plan, titled "Curing default and maintaining payments" however the Debtor lists no current monthly payment, estimated arrearages, interest rate(s) on arrearages, or amount to be paid to the creditor by the trustee.

8. Accordingly, Movant objects to the Debtor's Plan Dated June 11, 2021 because it fails to provide for payment in full of the Movant's secured claim. See 11 U.S.C. § 1325(a)(5)(A)-(B).

WHEREFORE, Movant, Atlantica, LLC, requests this Honorable Court to enter an Order denying confirmation of the Debtors' Chapter 13 Plan dated June 11, 2021.

Dated: September 14 2021

Respectfully submitted,

THE LYNCH LAW GROUP

By: /s/Michael C. Mazack  
Michael C. Mazack, Esquire  
Pa. I.D. No. 205742

The Lynch Law Group, LLC  
501 Smith Drive, Suite 3  
Cranberry Twp., PA 16066  
(724) 776-8000

*Attorney for Movant*